

## Immunization Program Revision and Update of Chapter 246-100 WAC

*Immunization of Child Care and School Children against Certain Vaccine Preventable Diseases*

**State Board of Health Hearing – March 9, 2005**

### Public Comments

TOPIC	COMMENTS/QUESTIONS	RECEIVED FROM	DOH RESPONSE
Interest in the rule revision process.	I would like to be informed or involved in decisions regarding the development of new school requirements.	<b>2/15/05</b>  Neil Kaneshiro, MD Woodinville Pediatrics University of Washington Clinical Assistant Professor of Pediatrics Board of Trustees, Washington Chapter AAP	Dr. Kaneshiro to be added to the "interested parties" list for proposed rule revisions on this subject to keep him informed on opportunities to participate in decision making. He was informed of the SBOH hearing on some language revisions affecting WAC 246-100-166 scheduled for March 9 in Tumwater, WA.
Reference to 2004 Advisory Committee on Immunization Practices (ACIP) Childhood and Adolescent Immunization Schedule	Why does the revision use the 2004 ACIP guidelines when we now have the 2005 schedule available?	<b>2/15/05</b>  Betsy Hubbard, RN Immunization Coordinator, SKCPH	SBOH to make a motion to adopt the 2005 ACIP Childhood and Adolescent Immunization Schedule.
Clarifying a cross reference to the definition of "full immunization."	I reviewed part of the PDF document. Here are the things I noted – look at them and see what you think.  Pg 4, 2-f refers to "f of this subsection" However this is f... where do they refer to? This needs to be corrected.  Pg 8 3 this list of requirements does not include parent signature; however parent signature is listed in other sections, e.g. exemptions.	<b>2/17/05</b>  Original message sent to Janice Doyle. Response made by designee:  Pam Mortenson (SNOW)	Change (f) to (g) to correctly reference the definition of full immunization under Section 2(g)  As to the second comment, DOH staff attempted to clarify the reference to "Pg 8 3" but has not received an answer.
Clarifying a typographical error to the purpose statement in section one.	It looks good, and more readable, for a typo you might add an "s" to the word outbreak on the top of page 1. P.S. it's great to have this updated!	<b>2/17/05</b>  Mary Small, PHN, BSN, Nursing Director Communicable Disease Supervisor Chelan Douglas Health District	Change the word "outbreak" to "outbreaks" in Section 1.

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Requirement of an office record of immunization  Hepatitis A requirement	As a school nurse who has had to deal with mumps outbreak and Hep A in the 2 years I would suggest that parents provide by a certain time an official copy of their records for the school to record and of course having Hepatitis A required. Thank you for your consideration.	<b>2/23/05</b>  Phyllis Fries , School Nurse <a href="mailto:pfries@esd165.org">pfries@esd165.org</a>	Under the proposed language, supporting documents are no longer required. Instead, an updated Certificate of Immunization Status (CIS) form is sufficient.
Reference to ACIP schedule	I have a question – is it a requirement for the rule to include the date of the most recent immunization schedule – I wondered why it just does not say something like “the most recent published ACIP schedule”?	<b>2/18/05</b>  Peggy Grigg <a href="mailto:pgrigg@granthealth.org">pgrigg@granthealth.org</a>	According to assistant attorney general guidance, reference to “the most recent published ACIP schedule” would be an improper reference since it is an illegal delegation of authority.
Regarding use of Children’s Health Immunizations Linkages and Development (CHILD) Profile form	I have not seen the CHILD profile form. Do I understand that it can take the place of a CIS Form? What are other forms approved by the DOH in section WAC 246-100-166 2 Definitions a...iii ?	<b>2/16/05</b>  Jean Boldan, Issaquah	CHILD Profile puts the child’s immunization information onto a CIS form that in turn can be printed out and signed by the parent.
How the rule addresses additional changes in immunization requirements, such as varicella.  Who would provide yearly information to schools and child care centers.	Sorry for the late response...I’ve been away a while. The changes look good and I would appreciate distribution of the new rules once adopted. I was wondering how additional changes in immunization requirements are handled as there is no room for that as I read the changes. I’m thinking of proposed varicella requirement for school attendance.  Also, not mentioned is who provides the yearly information to schools/child care centers but maybe that does not need inclusion in the rules or maybe I overlooked it. Nice work, Karen.	<b>3/2/05</b>  Mona Miles Koehler RN, School Nurse, Ellensburg School District	If the SBOH were to require additional immunizations for child care and school entry, rule language would have to be revised to include the new requirement.  The question of who provides yearly information to schools and child care centers is unclear and needs clarification. DOH staff had sent an e-mail reply, and have not received an answer to date.

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Enforcement of exclusions and preventing admission of children who do not meet immunization requirements.	Is there any enforcement “slaps on the hand” for schools/child care facilities not meeting the rules in terms of exclusion of students or prevention of admission if immunizations are not met? Maybe that is not appropriate to the rules. Thanks.		The current rule does not address the enforcement of exclusions. Policy on exclusions is outside the scope of this rule revision effort.
Continue immunization requirements enforcement by grade level.	Thank you for the opportunity to review the proposed changes. I do not anticipate any difficulties with them. I would encourage immunization requirements for school attendance to continue to be by grade level to facilitate the management of exclusion/compliance issues with the most ease.	<b>3/2/05</b>  Johanna Bradley, School Health Services Seattle Public Schools	The current rule does not address whether immunization requirements be enforced by grade level.
Formatting Suggestion	The Mead School District, Spokane, WA nurses reviewed the immunization document and thought the content and simplicity was good. You may not have ability to change the format but I thought it may read easier if indentations were made for the different sections. For example under (2) Definitions (a) could be indented and then (i), (ii), (iii) also indented a couple of spaces to help the reader understand that (i) etc falls under (a)certificate of immunization status means:	<b>2/24/05</b>  Patti Buck <a href="mailto:pbuck@mead.k12.wa.us">pbuck@mead.k12.wa.us</a> Mead School District	Format is determined by the Office of the Code Reviser.
Update to current ACIP guidelines.  Clarify reference to “CIS”.	You asked me to review this and comment. All seems fine to me. No real changes other then updating the current ACIP guidelines. The only other thing I	<b>2/23/05</b>  Marni Storey	According to assistant attorney general guidance, reference to “the most recent published ACIP schedule” would be an improper reference since it is an illegal

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	noticed is they refers to the Certificate of Immunization Status "CIS" and it is easy to miss or not know what "CIS" stands for. I didn't see CIS in the definitions section. Late in the document it uses the term certificate if immunization status but never connects it to "CIS"		delegation of authority. The SBOH may adopt through motion.  "CIS" or Certificate of Immunization Status is the first term defined under Section 2. CIS is referred to numerous times throughout the rule.
Reference to 2004 ACIP Schedule and elimination of reference to AAP (American Academy of Pediatrics), ACIP (Advisory Committee of Immunization Practice) and AAFP (American Academy of Family Physicians).  Transmission of exemption lists to Local Health Jurisdictions	Karen, I have reviewed the new immune rules and generally agree with them. Two areas for suggestion are: 1. page 3 item j...change the "July to Dec 2004" to "current US "Recommended Childhood and Adolescent Immunization". Remove the language about AAP, ACIP and AAFP...so that the rule is flexible without losing definition. 2.. page 7 item iii d eliminate the last two words "upon request". This notification should be routine so that LHJ's can react more quickly.	<b>2/25/05</b>  Edmond Gray, NETCHD <a href="mailto:ewgray@ultraplix.com">ewgray@ultraplix.com</a>	According to assistant attorney general guidance, reference to "the most recent published ACIP schedule" would be an improper reference since it is an illegal delegation of authority. The SBOH may adopt through motion.  DOH would recommend keeping language referring to approval by AAP, ACIP and AAFP.  In the past, local health departments only request a list of exempted students in the event of an outbreak.
Reference to 2004 ACIP Schedule  Revision of the CIS to document receipt of an immunization by a child under conditional status.	On page 3; "(j) National Immunization Guidelines...." is it possible to refer to the "Recommended Childhood and Adolescent Immunization Schedule: United States-- for the current year rather than July to December 2004" so the document will not so quickly outdate?  If you do have to use the actual year why not use 2005 schedule?  Otherwise it looks like you have made the WAC more clear. You must be revising	<b>2/25/05</b>  Becky Dorcas RN, PHN Immunization Program Whatcom County Health Department 1500 N. State Street Bellingham WA 98225-4551 Phone: 360-738-2504, ext 50818 FAX: 360-676-6772 <a href="mailto:rdorcas@co.whatcom.wa.us">rdorcas@co.whatcom.wa.us</a>	According to assistant attorney general guidance, reference to "the most recent published ACIP schedule" would be an improper reference since it is an illegal delegation of authority. The SBOH may adopt through motion.  The CIS may be revised in the future to document immunizations received by a child under conditional status. This may require further policy discussion by the SBOH.

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	the CIS to allow tracking of when a conditional child's next vaccine is due.		
Schools and child care centers to maintain a list of children with exemptions.	Under WAC 246-100-166, (4) Duty of schools and child care centers (ii) Schools and child care centers shall keep a list of children with medical exemptions. This might be considered as additional paperwork burden on the child care providers. The information may be extrapolated from the CIS on hand at the facility when needed, rather than maintaining a separate list.	<b>2/28/05</b>  Mark Kastenbaum <a href="mailto:kasteME@dshs.wa.gov">kasteME@dshs.wa.gov</a>	The current rule requires, under Section 8(d) that schools, preschools, and child care centers are required to keep on file a list of children with exemptions.  The proposed rule language further clarifies this requirement to list each type of exemptions: medical, philosophical, religious, and personal.

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